



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

KATHLEEN JENNINGS, Attorney)
General of the State of Delaware,)
)
Plaintiff,)
)
v.)
)
MASTERS INTERNATIONAL INC., a)
Delaware corporation,)
)
Defendant.)
)

C.A. No. _____

VERIFIED COMPLAINT

Plaintiff Kathleen Jennings, Attorney General of the State of Delaware, by and through undersigned counsel, for her complaint against Defendant MASTERS INTERNATIONAL INC. (“Masters” or the “Defendant”), alleges, upon verified information, as follows:

Nature of the Action

1. This is an action for the cancellation of Defendant’s certificates of incorporation as a Delaware corporation due to the Defendant’s placement on the United States Department of the Treasury Office of Foreign Asset Control (“OFAC”) Specially Designated Nationals List (“SDN”).

2. Under 8 *Del. C.* § 284, the Attorney General is authorized to request that the Court of Chancery revoke or forfeit the charter of any corporation for abuse, misuse or nonuse of its corporate powers, privileges or franchises.

3. The Attorney General seeks cancellation of Defendant's corporate charter because the Defendant has been placed on the OFAC sanctions list for undermining the democratic processes or institutions of Zimbabwe pursuant to federal Executive Order 13469 issued July 25, 2008. Additionally, the entity has serious deficiencies in compliance with the requirement to retain their Delaware entity status, as described in further detail below.

4. Delaware law has never permitted or condoned the use of business entities formed under its laws for unlawful or nefarious purposes. Defendant's SDN designation by OFAC, and failure to comply with Delaware legal requirements, establish that Defendant has abused and misused its entity powers and privileges. Having abandoned the responsibilities that come with status as Delaware limited liability companies and Delaware corporations, Defendant must be forever denied the rights and privileges that also come with that status, and its corporate charter must therefore be canceled.

Parties

5. Plaintiff Kathleen Jennings ("Attorney General") is the Attorney General of the State of Delaware.

6. Defendant is a corporation organized under the laws of the State of Delaware which had a Registered Agent known as Corporation Service Company. The Registered Agent resigned as of March 10, 2009.¹

7. The OFAC administers and enforces economic and trade sanctions based on United States foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security.²

8. OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of targeted countries, terrorists and narcotics traffickers known as the SDN. These entities assets are blocked and United States citizens are generally prohibited from dealing with them.³

9. The Delaware Department of State (“DOS”) enacted regulations, effective January 1, 2019 to require registered agents to verify the identity of their customer business entities.⁴ In addition to the collection of background identifying

¹ The formation documents for this entity are attached as Exhibit A. The resignation documents for the Registered Agent are also included with this exhibit.

² <https://www.treasury.gov/about/organizational-structure/offices/pages/office-of-foreign-assets-control.aspx>

³ <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

⁴ House Bill 404 of the 149th Delaware General Assembly, as amended by House Amendment No. 1 and Senate Amendment No. 2, 81 *Del. Laws*, Ch. 334, modified

information, this regulation mandates that registered agents check the OFAC listings prior to filing on behalf of a business entity and to periodically update the entity's status on the SDN to ensure that such entities are blocked from conducting business. These regulations may be found at 20 Del. Admin. Code § 101.⁵

Factual Allegations

10. On or about February 11, 2009, the United States Government placed the Defendant on the OFAC list and notified Delaware of this decision. The basis for the placement on the OFAC list was that Masters interfered with the democratic processes or institutions of Zimbabwe pursuant to federal Executive Order 13469 issued July 25, 2008.⁶

11. The Defendants has also garnered significant deficiencies which hinder its ability to retain Delaware entity status.

12. Masters has failed to appoint a registered agent.

8 *Del.C.* §132; 6 *Del.C.* §§15-111, 17-104 and 18-104 to enable the Secretary to establish regulations for Registered Agents to verify the identification of their customer business entities.

⁵ A copy of these regulations are attached as Exhibit B.

⁶ A copy of this Executive Order is attached as Exhibit C. A copy of the Federal Register pages relevant to this Order is attached as Exhibit D.

13. The placement of the Defendant on the OFAC list, combined with its Delaware-specific deficiency, proves that the powers, privileges, or existence of the corporation have been abused or misused by the Defendant.

Causes of Action

Count I—Cancellation of Corporate Charter of MASTERS INTERNATIONAL INC.

14. Paragraphs 1 through 13 of this Complaint are repeated and realleged as if fully set forth herein.

15. Under 8 *Del. C.* § 284, the Attorney General is authorized to request that the Court of Chancery revoke or forfeit the charter of any corporation for abuse, misuse or nonuse of its corporate powers, privileges or franchises.

16. Masters has been placed on the OFAC list for interference with democratic processes or institutions of Zimbabwe pursuant to federal Executive Order 13469 issued July 25, 2008.

17. Masters has never sought delisting from the OFAC list.

18. Masters has also failed to appoint a Delaware registered agent.

19. The above-referenced placement on the OFAC as a SDN establishes that Masters has engaged in acts of fraud, immorality, or violations of statutory law in connection with its operations.

20. Masters has abused the powers, privileges, and existence granted to it as a Delaware corporation, as a result of which it should be denied the rights and

privileges that also come with status as a Delaware corporation, and its corporate charter should therefore be canceled.

21. The Attorney General has no adequate remedy at law.

★ ★ ★

WHEREFORE, the Attorney General prays for judgment and requests that the Court enter an Order:

- A. Directing the Delaware Division of Corporations to cancel the corporate charter of MASTERS INTERNATIONAL INC., and
- B. Granting such other and further relief as the Court deems just and appropriate.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Lawrence W. Lewis
Lawrence W. Lewis (#2539)
Oliver J. Cleary (#5830)
Deputy Attorneys General
Delaware Department of Justice
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400

*Attorneys for Kathleen Jennings,
Attorney General of the State of
Delaware*

Dated: September 19, 2019

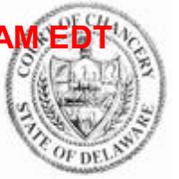


EXHIBIT A

CERTIFICATE OF INCORPORATION
OF
MASTERS INTERNATIONAL INC.

FIRST. The name of this corporation shall be:

MASTERS INTERNATIONAL INC.

SECOND. Its registered office in the State of Delaware is to be located at 1013 Centre Road, in the City of Wilmington, County of New Castle and its registered agent at such address is CORPORATION SERVICE COMPANY.

THIRD. The purpose or purposes of the corporation shall be:

To engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

FOURTH. The total number of shares of stock which this corporation is authorized to issue is:

Ten Thousand (10,000) Shares With A Par Value Of One Dollar (\$1.00) Each, Amounting To Ten Thousand Dollars (\$10,000.00).

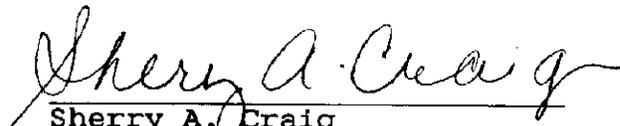
FIFTH. The name and address of the incorporator is as follows:

Sherry A. Craig
Corporation Service Company
1013 Centre Road
Wilmington, DE 19805

SIXTH. The Board of Directors shall have the power to adopt, amend or repeal the by-laws.

SEVENTH. No director shall be personally liable to the Corporation or its stockholders for monetary damages for any breach of fiduciary duty by such director as a director. Notwithstanding the foregoing sentence, a director shall be liable to the extent provided by applicable law, (i) for breach of the director's duty of loyalty to the Corporation or its stockholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) pursuant to Section 174 of the Delaware General Corporation Law or (iv) for any transaction from which the director derived an improper personal benefit. No amendment to or repeal of this Article Seventh shall apply to or have any effect on the liability or alleged liability of any director of the Corporation for or with respect to any acts or omissions of such director occurring prior to such amendment.

IN WITNESS WHEREOF, the undersigned, being the incorporator hereinbefore named, has executed, signed and acknowledged this certificate of incorporation this eighteenth day of April, A.D., 1994.


Sherry A. Craig
Incorporator

CERTIFICATE
FOR RENEWAL AND REVIVAL OF CHARTER
OF
MASTERS INTERNATIONAL INC.

MASTERS INTERNATIONAL INC., a corporation organized under the laws of the State of Delaware, the Certificate of Incorporation of which was filed in the Office of the Secretary of State on the fifteenth day of April A. D. 1994, the charter of which was voided for nonpayment of taxes, now desires to procure a restoration, renewal and revival of its charter, and hereby certifies as follows:

1. The name of this corporation is:

MASTERS INTERNATIONAL INC.

2. Its registered office in the State of Delaware is located at 1013 Centre Road, in the City of Wilmington, County of New Castle and its registered agent is CORPORATION SERVICE COMPANY.

3. The date when the restoration, renewal, and revival of the charter of this company is to commence is the twenty-ninth day of February, A. D., 1996, same being prior to the date of the expiration of the charter. This renewal and revival of the charter of this corporation is to be perpetual.

4. This corporation was duly organized and carried on the business authorized by its charter until the first day of March, A. D., 1996, at which time its charter became inoperative and void for non-payment of taxes and this certificate for renewal and revival is filed by authority of the duly elected directors of the corporation in accordance with the laws of the State of Delaware.

IN TESTIMONY WHEREOF, and in compliance with the provisions of Section 312 of the General Corporation Law of the State of Delaware, as amended, MASTERS INTERNATIONAL INC. has caused this Certificate to be signed by John A. Bredenkamp, this 4th day of April A. D. 1997.

/s/ John A. Bredenkamp
Authorized Officer
President

**CERTIFICATE OF RENEWAL AND REVIVAL OF
CERTIFICATE OF INCORPORATION
OF
MASTERS INTERNATIONAL INC.**

It is hereby certified that :

1. The name of the corporation (hereinafter called the " corporation ") is **MASTERS INTERNATIONAL INC.**
2. The corporation was organized under the provisions of the **General Corporation Law of the State of Delaware**. The date of filing of its original certificate of incorporation with the Secretary of State of the State of Delaware is **April 15 , 1994**.
3. The address , including the street , city , and county , of the registered office of the corporation in the State of Delaware and the name of the registered agent at such address are as follows : **Corporation Service Company , 2711 Centerville Road , Suite 400 , Wilmington , Delaware 19808 , County of New Castle.**
4. The corporation hereby procures a renewal and revival of its certificate of incorporation which became inoperative by law on **March 1, 2000** for failure to file annual reports and non - payment of taxes payable to the State of Delaware.
5. The certificate of incorporation of the corporation , which provides for and will continue to provide for , perpetual duration , shall , upon the filing of this **Certificate of Renewal and Revival of the Certificate of Incorporation** in the Department of State of the State of Delaware , be renewed and revived and shall become fully operative on **February 29, 2000**
6. This **Certificate of Renewal and Revival of the Certificate of Incorporation** is filed by authority of the duly elected directors as prescribed by Section 312 of the **General Corporation Law of the State of Delaware**.

Signed on **September 28 , 2000**.



Stephanus J. Duvenage
Director

STATE OF DELAWARE
CERTIFICATE OF RESIGNATION OF
REGISTERED AGENT
OF

Masters International Inc.

This is to certify that I, Corporation Service Company,
(address) 2711 Centerville Road, Suite 400, Wilmington, DE 19808,
Delaware, pursuant to Section 136 of the General Corporation Law of the State of
Delaware:

(1) Resigned the office of registered agent of Masters International Inc.
, a corporation of the State of
Delaware, on March 10, 2009, without appointing any person or corporation
as registered agent in my stead.

(2) That written notice of resignation was given to affected corporation at least 30
days prior to the filing of the certificate by mailing or delivering such notice to the
corporation at its address last known to the registered agent on February 9, 2009.

Corporation Service Company, Registered Agent

By: Deborah A. Hampton
Authorized Officer/Person

Name: Deborah A. Hampton, Assistant Secretary

Print or Type

State of Delaware

Annual Franchise Tax Report

CORPORATION NAME MASTERS INTERNATIONAL INC.	TAX YR. 2007
-------------------------------------------------------	------------------------

FILE NUMBER 2394737	INCORPORATION DATE 1994/04/15	RENEWAL/REVOCAION DATE 2000/09/29	
-------------------------------	-----------------------------------------	---------------------------------------------	--

PRINCIPAL PLACE OF BUSINESS 1905 South Florida Ave Lakeland FL 33803 United States	PHONE NUMBER 863/682-5151
-----------------------------------------------------------------------------------------------------	-------------------------------------

REGISTERED AGENT CORPORATION SERVICE COMPANY 2711 CENTERVILLE ROAD SUITE 400 WILMINGTON DE 19808	AGENT NUMBER 9000014
-----------------------------------------------------------------------------------------------------------------------------	--------------------------------

AUTHORIZED STOCK BEGIN DATE	END DATE	DESIGNATION/ STOCK CLASS	NO. OF SHARES	PAR VALUE/ SHARE
1994/04/15		COMMON	10,000	1.000000

OFFICER Mark C Lawson	NAME	STREET/CITY/STATE/ZIP Hurst Grove Sandford Lane Hurst Berkshire DE RG10-5Q UNITED KINGDOM	TITLE Director
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DIRECTORS Stephen Hamic	NAME	STREET/CITY/STATE/ZIP 1905 South Florida Ave Lakeland Fl 33803 United States	
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=====
Total number of directors:1

NOTICE: Pursuant to 8 Del. C. 502(b), If any officer or director of a corporation required to make an annual franchise tax report to the Secretary of State shall knowingly make any false statement in the report, such officer or director shall be guilty of perjury.

AUTHORIZED BY (OFFICER, DIRECTOR OR INCORPORATOR) Stephen Hamic	DATE 2008-02-27	TITLE Director
---------------------------------------------------------------------------	---------------------------	--------------------------

1905 S Florida Ave
Lakeland Fl 33803 United States

State of Delaware

Annual Franchise Tax Report

CORPORATION NAME MASTERS INTERNATIONAL INC.					TAX YR. 2007
FILE NUMBER 2394737	FEDERAL EMPLOYER ID NO.				
ASSETS FOR REGULATED INVESTMENT CORPS JAN. 1st.		DEC. 31st.			
DATE(S) OF INACTIVITY FROM TO					

TOTAL NUMBER OF SHARES ISSUED		TOTAL GROSS ASSETS		ASSET DATE	

FRANCHISE TAX 112.50	PENALTY 0.00	1.5% MONTHLY INTEREST 0.00	ANNUAL FILING FEE 25.00	PREV CREDIT OR BALANCE 0.00	
PREPAID QRTY. PAYMENTS 0.00	AMOUNT DUE 137.50	AMOUNT PAID 137.50	CHECK NUMBER		



EXHIBIT B



**DEPARTMENT OF STATE
Division of Corporations**

101 Registered Agent Customer Entity Verification Requirements

1.0 Enabling Legislation

House Bill 404 of the 149th Delaware General Assembly, as amended by House Amendment No. 1 and Senate Amendment No. 2, 81 **Del. Laws**, Ch. 334, modifies 8 **Del.C.** §132; 6 **Del.C.** §§15-111, 17-104 and 18-104 to enable the Secretary to establish regulations for Registered Agents to verify the identification of their customer business entities.

2.0 Purpose

The purpose of this regulation is to clarify the obligation of Registered Agents in Delaware to comply with regulations issued by the Secretary pertaining to Business Entity Formation in matters involving filings submitted to the Secretary on behalf of corporations, partnerships, trusts, limited partnerships, and limited liability companies. This regulation outlines the standards for Registered Agents regarding verification of customer entities in accordance with House Bill 404 of the 149th Delaware General Assembly, as amended by House Amendment No. 1 and Senate Amendment No. 2, 81 **Del. Laws**, Ch. 334.

3.0 Definitions

The following words and terms, when used in this regulation, shall have the following meaning unless the context clearly indicates otherwise:

"Business Entity Formation" means the act of any person, partnership, association, corporation, company, singly or jointly with others, in organizing under the Delaware Code and filing the required documents with the Division of Corporations in the Department of State.

"Business Entity Representation" means any person, partnership (whether general (including a limited liability partnership) or limited (including a limited liability limited partnership)), association, corporation, company, singly or jointly with others, that acts on behalf of any person or entity as a registered agent.

"Corporation" means an entity that is organized or incorporated in accordance with the Delaware Code and as expressly set forth at Title 8 of the Delaware Code.

"Customer" means the person or persons intending to form, and/or otherwise conduct activities through, a business entity formed, registered or qualified in Delaware.

"Customer Information" means any and all information or documents relating to the true and correct identity of a potential customer of a Registered Agent that includes, but is not limited to, full name, complete address (to include background information related to a P.O. Box address), photographs, background information, or any other information as needed to verify identification.

"Department" means the Delaware Department of State.

"Limited Liability Company" means an entity that is organized or created in accordance with the requirements of a "limited liability company" or a "series" as set forth in the Delaware Code and as expressly defined at 6 **Del.C.** §18-101, as amended.

"Limited Partnership" means an entity that is organized or created in accordance with the requirements of a "limited liability partnership" as set forth in the Delaware Code and as expressly defined at 6 **Del.C.** §17-101 as amended.

"Office of Foreign Assets Control" means the office or its equivalent office(s) as created by federal laws and administered by order of the United States Department of the Treasury or its successor(s) or equivalent department(s).

"Partnership" means an entity that is organized or created in accordance with the requirements of a "partnership" as set forth in the Delaware Code at 6 **Del.C.** §15-202 as amended.

"Registered Agents" means an agent or agents as defined or described in accordance with the Delaware Code and as expressly set forth at 8 **Del.C.** §132 and 6 **Del.C.** §§15-111, 17-104 and 18-104.

"Secretary" means the Secretary of the Delaware Department of State.

"Specially Designated Nationals and Blocked Persons (SDN)" means individuals, groups and entities as defined or described as "Specially Designated Nationals" by the Office of Foreign Assets Control.

TITLE 20 CORPORATIONS

DELAWARE ADMINISTRATIVE CODE

"Trust" means a statutory trust as set forth in the Delaware Code and as expressly defined in 12 Del.C. Ch. 38 as amended.

4.0 Procedures

- 4.1 Registered Agents are required to complete the following steps to verify filings submitted to the Secretary on behalf of corporations, partnerships, limited partnerships, trusts, and limited liability companies in the course of Business Entity Representation:
- 4.1.1 Prior to engaging in business:
- 4.1.1.1 Registered Agents will take reasonable steps to verify the identity of potential customers. Such steps may include, but are not limited to, manual verification, the use of software or third party services to perform background or identification verification or obtaining such documents sufficient for identity.
- 4.1.2 New Customer Information:
- 4.1.2.1 Registered Agents shall compare new customer information against the register and lists of the Office of Foreign Assets Control ("OFAC"), before performing services on behalf of any new customer. Customer information shall include the full name and complete address of the submitting customer (whether business or individual).
- 4.1.2.2 For Business Entity Formation or Business Entity Representation, Registered Agents shall collect and retain the full name, business address and business telephone number of the current communications contact(s) and any other such information that shall hereafter be required by statute. In addition, Registered Agents may collect additional information, including, but not limited to officers, directors, members, managing members, partners, or owners. All such information collected shall be compared against OFAC.
- 4.1.3 Updating names and addresses of related parties:
- 4.1.3.1 Registered Agents shall request (at minimum annually) updates to the communications contact(s) and any other information required by statute. To the extent additional information has been collected, Registered Agents may, at their discretion, request updates to such information. All updated information shall be compared against OFAC.
- 4.1.4 Entity and Customer Information transferred from another Registered Agent:
- 4.1.4.1 Registered Agents shall compare all entity and customer information transferred from another registered agent against the register and lists of OFAC, or its successor, before accepting the customer.
- 4.1.4.2 Entity information shall include the full name, business address and business telephone number of communications contact(s), any other information required by statute along with any additional information collected by the previous registered agent.
- 4.1.5 Quarterly Review:
- 4.1.5.1 Registered Agents shall review complete customer registry against the OFAC register or lists at a minimum on a quarterly basis.
- 4.1.6 Notifications:
- 4.1.6.1 Registered Agents shall sign up for notifications and updates from OFAC, to include but not limited to updates on specific sanctions.
- 4.1.7 OFAC Search Lists:
- 4.1.7.1 Registered Agents shall search for either individuals or corporate entities on all OFAC lists, to include but not limited to "Specially Designated Nationals" and "Blocked Persons" lists. Registered Agents may use software or third party services to perform a search of OFAC lists.

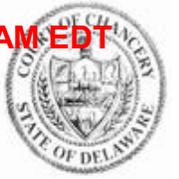


EXHIBIT C

Title 3—

Executive Order 13469 of July 25, 2008

The President

Blocking Property of Additional Persons Undermining Democratic Processes or Institutions in Zimbabwe

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*), and section 301 of title 3, United States Code,

I, GEORGE W. BUSH, President of the United States of America, find that the continued actions and policies of the Government of Zimbabwe and other persons to undermine Zimbabwe's democratic processes or institutions, manifested most recently in the fundamentally undemocratic election held on June 27, 2008, to commit acts of violence and other human rights abuses against political opponents, and to engage in public corruption, including by misusing public authority, constitute an unusual and extraordinary threat to the foreign policy of the United States, and to deal with that threat, hereby expand the scope of the national emergency declared in Executive Order 13288 of March 6, 2003, and relied upon for additional steps taken in Executive Order 13391 of November 22, 2005, and hereby order:

Section 1. (a) Except to the extent provided by statutes, or provided in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the date of this order, all property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of United States persons, including their overseas branches, of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in:

Any person determined by the Secretary of the Treasury, after consultation with the Secretary of State:

- (i) to be a senior official of the Government of Zimbabwe;
- (ii) to be owned or controlled by, directly or indirectly, the Government of Zimbabwe or an official or officials of the Government of Zimbabwe;
- (iii) to have engaged in actions or policies to undermine Zimbabwe's democratic processes or institutions;
- (iv) to be responsible for, or to have participated in, human rights abuses related to political repression in Zimbabwe;
- (v) to be engaged in, or to have engaged in, activities facilitating public corruption by senior officials of the Government of Zimbabwe;
- (vi) to be a spouse or dependent child of any person whose property and interests in property are blocked pursuant to Executive Order 13288, Executive Order 13391, or this order;
- (vii) to have materially assisted, sponsored, or provided financial, material, logistical, or technical support for, or goods or services in support of, the Government of Zimbabwe, any senior official thereof, or any person whose property and interests in property are blocked pursuant to Executive Order 13288, Executive Order 13391, or this order; or (viii) to be owned or controlled by, or to have acted or purported to act for or on behalf

of, directly or indirectly, any person whose property and interests in property are blocked pursuant to Executive Order 13288, Executive Order 13391, or this order.

(b) I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to paragraph (a) of this section would seriously impair my ability to deal with the national emergency declared in Executive Order 13288, as amended, and I hereby prohibit such donations as provided by paragraph (a) of this section.

(c) The prohibitions of this section include but are not limited to (i) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to Executive Order 13288, Executive Order 13391, or this order, and (ii) the receipt of any contribution or provision of funds, goods, or services from any such person.

(d) The provisions of Executive Orders 13288 and 13391 remain in effect, and this order does not affect any action taken pursuant to those orders.

Sec. 2. (a) Any transaction by a United States person or within the United States that evades or avoids, has the purpose of evading or avoiding, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 3. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States; and

(d) the term "Government of Zimbabwe" means the Government of Zimbabwe, its agencies, instrumentalities, and controlled entities.

Sec. 4. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that, because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render these measures ineffectual. I therefore determine that, for these measures to be effective in addressing the national emergency declared in Executive Order 13288, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 5. The Secretary of the Treasury, after consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government consistent with applicable law. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 6. The Secretary of the Treasury, after consultation with the Secretary of State, is hereby authorized to submit the recurring and final reports to the Congress on the national emergency declared in Executive Order 13288, as amended, and 5 expanded in this order, consistent with section 401(c) of the NEA (50 U.S.C. 1641(c)) and section 204(c) of IEEPA (50 U.S.C. 1703).

Sec. 7. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, instrumentalities, or entities, its officers or employees, or any other person.

A handwritten signature in black ink, appearing to read "George W. Bush", written in a cursive style.

THE WHITE HOUSE,
July 25, 2008.

[FR Doc. 08-1480
Filed 7-25-08; 8:45 am]
Billing code 3195-W8-P

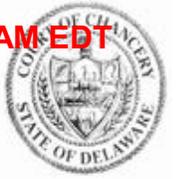


EXHIBIT D



Federal Register

Tuesday,
June 23, 2009

Part II

Office of Foreign Assets Control

31 CFR Chapter V
Alphabetical Listing of Blocked Persons,
Blocked Vessels, Specially Designated
Nationals, Specially Designated Terrorists,
Specially Designated Global Terrorists,
Foreign Terrorist Organizations, and
Specially Designated Narcotics Traffickers;
Final Rule

DEPARTMENT OF THE TREASURY

Office of Foreign Assets Control

31 CFR Chapter V

Alphabetical Listing of Blocked Persons, Blocked Vessels, Specially Designated Nationals, Specially Designated Terrorists, Specially Designated Global Terrorists, Foreign Terrorist Organizations, and Specially Designated Narcotics Traffickers

AGENCY: Office of Foreign Assets Control, Treasury.

ACTION: Final rule.

SUMMARY: The Office of Foreign Assets Control ("OFAC") of the Department of the Treasury is amending Appendix A to 31 CFR chapter V to: Reflect the addition to, or removal from, Appendix A, since it was last published, of the names of individuals and entities subject to the various economic sanctions programs administered by OFAC; provide updated identifying and clarifying information for certain individuals and entities included on the appendix; reflect the addition of Iran as an entity's associated sanctions program in certain circumstances and the removal of certain entities listed in Appendix A to 31 CFR part 560; and reflect the removal of North Korea as a sanctions program under which entities may be blocked. OFAC also is amending the "Appendixes to Chapter V—Note," which contains notes applicable to both Appendix A and Appendix B to 31 CFR chapter V, to reflect changes in the status of several programs and to clarify the obligations of financial institutions with respect to blocked vessels.

DATES: *Effective Date:* June 23, 2009.

FOR FURTHER INFORMATION CONTACT: Assistant Director, Compliance Programs, tel.: 202/622-2490, Office of Foreign Assets Control, or Chief Counsel (Foreign Assets Control), tel.: 202/622-2410, Office of the General Counsel, Department of the Treasury, Washington, DC 20220 (not toll free numbers).

SUPPLEMENTARY INFORMATION:

Electronic and Facsimile Availability

This document and additional information concerning OFAC are available from OFAC's Web site (<http://www.treas.gov/ofac>) or via facsimile through a 24-hour fax-on demand service, tel.: (202) 622-0077.

Background

Appendix A to 31 CFR chapter V is a list that contains the names of blocked persons, blocked vessels, specially

designated nationals, specially designated terrorists, specially designated global terrorists, foreign terrorist organizations, and specially designated narcotics traffickers blocked pursuant to the various economic sanctions programs administered by the Office of Foreign Assets Control ("OFAC"). OFAC is hereby amending and republishing Appendix A in its entirety to include or delete, as appropriate, the names of individuals and entities added to, or removed from, the list since it was last published, as well as to provide updated identifying and clarifying information for certain individuals and entities included on the list. OFAC also is amending the "Appendixes to Chapter V—Note," which contains notes applicable to both Appendix A and Appendix B to 31 CFR chapter V, to reflect changes in the status of several programs and to clarify the obligations of financial institutions with respect to blocked vessels.

In addition, OFAC is amending Appendix A by adding Iran as an associated sanctions program to entities determined by OFAC to be entities owned or controlled by the Government of Iran for purposes of the Iranian Transactions Regulations, 31 CFR part 560 (the "ITR"), that are also blocked or designated under other sanctions programs. OFAC is also amending Appendix A by removing entities determined to be owned or controlled by the Government of Iran that are not blocked or designated under another sanctions program. All such entities determined to be owned or controlled by the Government of Iran will continue to be listed in Appendix A to the ITR.

Finally, OFAC is amending Appendix A to reflect recent changes to the North Korea sanctions program by removing several specially designated nationals of North Korea. On June 26, 2008, the President signed Proclamation 8271, which terminated the exercise of authorities under the Trading with the Enemy Act with respect to North Korea. The President concurrently issued Executive Order 13466 of June 26, 2008 (73 FR 36787, June 27, 2008), which continued to block all property and interests in property of North Korea or a North Korea national that were blocked as of June 16, 2000, and remained blocked immediately prior to June 26, 2008, pursuant to the President's authority under the International Emergency Economic Powers Act (50 U.S.C. 1701-1706). Thus, while OFAC is removing the names of entities from Appendix A previously listed under the North Korea program to reflect the termination of the underlying authority for such listings,

property and interests in property of those North Korean nationals that was blocked immediately prior to June 26, 2008, nevertheless remains blocked pursuant to Executive Order 13466.

Frequently updated information on OFAC designations is provided for examination on or downloading from OFAC's Web site (<http://www.treas.gov/ofac>). Among other data, the Web site posts changes in designations and identifying information, including alternative spellings and additional aliases, and provides lists sorted by sanctions program. Updated information on OFAC designations should be consulted before engaging in transactions that may be subject to the economic sanctions programs administered by OFAC. Please note that some OFAC sanctions programs prohibit transactions involving individuals or entities not identified on this appendix.

This amendment reflects the complete list of persons identified on OFAC's Specially Designated Nationals and Blocked Persons list as of May 20, 2009, though alternative spellings and aliases are presented in a different format on the OFAC Web site. Changes after that date are not reflected in this document.

Public Participation

Because the amendment of Appendix A to 31 CFR chapter V involves a foreign affairs function, Executive Order 12866 and the provisions of the Administrative Procedure Act (5 U.S.C. 553), requiring notice of proposed rulemaking, opportunity for public participation, and delay in effective date, are inapplicable. Because no notice of proposed rulemaking is required for this rule, the Regulatory Flexibility Act (5 U.S.C. 601-612) does not apply.

■ For the reasons set forth in the preamble, and under the authority of 3 U.S.C. 301; 50 U.S.C. App. 1-44; 21 U.S.C. 1901-1908; 8 U.S.C. 1182; 18 U.S.C. 2339B; 22 U.S.C. 287c; 31 U.S.C. 321(b); 50 U.S.C. 1601-1651; 50 U.S.C. 1701-1706; Pub. L. 110-286, 122 Stat. 2632; E.O. 12947, 60 FR 5079, 3 CFR, 1995 Comp., p. 319; E.O. 12957, 60 FR 14615, 3 CFR, 1995 Comp., p. 332; E.O. 12959, 60 FR 24757, 3 CFR, 1995 Comp., p. 356; E.O. 12978, 60 FR 54579, 3 CFR, 1995 Comp., p. 415; E.O. 13059, 62 FR 44531, 3 CFR, 1997 Comp., p. 217; E.O. 13067, 62 FR 59989, 3 CFR, 1997 Comp., p. 230; E.O. 13099, 63 FR 45167, 3 CFR, 1998 Comp., p. 208; E.O. 13219, 66 FR 34777, 3 CFR, 2001 Comp., p. 778; E.O. 13224, 66 FR 49079, 3 CFR, 2001 Comp., p. 786; E.O. 13268, 67 FR 44751, 3 CFR, 2002 Comp., p. 240; E.O. 13288, 68 FR 11457, 3 CFR, 2003 Comp., p. 186; E.O. 13304, 68 FR

32315, 3 CFR, 2003 Comp., p. 229; E.O. 13310, 68 FR 44853, 3 CFR, 2003 Comp., p. 241; E.O. 13315, 68 FR 52315, 3 CFR, 2003 Comp., p. 252; E.O. 13338, 69 FR 26751, 3 CFR, 2004 Comp., p. 168; E.O. 13348, 69 FR 44885, 3 CFR, 2004 Comp., p. 189; E.O. 13350, 69 FR 46055, 3 CFR, 2004 Comp., p. 196; E.O. 13382, 70 FR 38567, 3 CFR, 2005 Comp., p. 170; E.O. 13391, 70 FR 71201, 3 CFR, 2005 Comp., p. 206; E.O. 13396, 71 FR 7389, 3 CFR, 2006 Comp., p. 209; E.O. 13399, 71 FR 25059, 3 CFR, 2006 Comp., p. 218; E.O. 13400, 71 FR 25483, 3 CFR, 2006 Comp., p. 220; E.O. 13405, 71 FR 35485, 3 CFR, 2006 Comp., p. 231; E.O. 13412, 71 FR 61369, 3 CFR, 2006 Comp., p. 244; E.O. 13413, 71 FR 64105, 3 CFR, 2006 Comp., p. 247; E.O. 13438, 72 FR 39719, 3 CFR, 2007 Comp., p. 224; E.O. 13441, 72 FR 43499, 3 CFR, 2007 Comp., p. 232; E.O. 13448, 72 FR 60223, 3 CFR, 2007 Comp., p. 304; E.O. 13460, 73 FR 8991; E.O. 13464, 73 FR 24491; E.O. 13466, 73 FR 36787; and E.O. 13469, 73 FR 43841; the "Appendixes to Chapter V—Note" and Appendix A to Chapter V of 31 CFR are amended as set forth below:

■ 1. The "Appendixes to Chapter V—Note" is amended by:

■ a. Redesignating notes 6 and 7 as notes 7 and 8, respectively;

■ b. Adding a new note 6; and

■ c. Revising newly redesignated note 7.

The addition and revision read as follows:

Appendixes to Chapter V—NOTE

* * * * *

6. Except in limited circumstances, financial institutions are instructed to reject any funds transfer referencing a blocked vessel and must notify OFAC, preferably via facsimile with a copy of the payment instructions, that funds have been returned to remitter due to the possible involvement of a blocked vessel in the underlying transaction. See § 501.604(b)(1) of this chapter. Financial institutions should contact OFAC's Compliance Programs Division for further instructions should the name of a blocked vessel appear in shipping documents presented under a letter of credit or if noticed in a documentary collection. Blocked vessels must themselves be physically blocked should they enter U.S. jurisdiction. Freight forwarders and shippers may not charter, book cargo on, or otherwise deal with blocked vessels.

7. References to regulatory parts in chapter V or other authorities:

[BALKANS]: Western Balkans Stabilization Regulations, part 588; Executive Order 13304, 68 FR 32315;

[BELARUS]: Executive Order 13405, 71 FR 35485;

[BURMA]: Burmese Sanctions Regulations, part 537; Executive Order 13448, 72 FR 60223; Executive Order 13464, 73 FR 24491;

[COTED]: Persons Contributing to the Conflict in Cote d'Ivoire Sanctions Regulations, part 543;

[CUBA]: Cuban Assets Control Regulations, part 515;

[DARFUR]: Executive Order 13400, 71 FR 25483;

[DRC]: Executive Order 13413, 71 FR 64105;

[FTO]: Foreign Terrorist Organizations Sanctions Regulations, part 597;

[IRAN]: Iranian Transactions Regulations, part 560;

[IRAQ2]: Executive Order 13315, 68 FR 52315; Executive Order 13350, 69 FR 46055;

[IRAQ3]: Executive Order 13438, 72 FR 39719;

[JADE]: Pub. L. 110-286, 122 Stat. 2632;

[LEBANON]: Executive Order 13441, 72 FR 43499;

[LIBERIA]: Former Liberian Regime of Charles Taylor Sanctions Regulations, part 593;

[NPWMD]: Weapons of Mass Destruction Proliferators Sanctions Regulations, part 544;

[SDGT]: Global Terrorism Sanctions Regulations, part 594;

[SDNT]: Narcotics Trafficking Sanctions Regulations, part 536;

[SDNTK]: Foreign Narcotics Kingpin Sanctions Regulations, part 598;

[SDT]: Terrorism Sanctions Regulations, part 595;

[SUDAN]: Sudanese Sanctions Regulations, part 538;

[SYRIA]: Syrian Sanctions Regulations, part 542; Executive Order 13399, 71 FR 25059;

Executive Order 13460, 73 FR 8991; and

[ZIMB]: Zimbabwe Sanctions Regulations, part 541; Executive Order 13391, 70 FR 71201; Executive Order 13469, 73 FR 43841.

* * * * *

Appendix A—[Amended]

■ 2. Appendix A to Chapter V of 31 CFR is revised to read as follows:

APPENDIX A TO CHAPTER V— ALPHABETICAL LISTING OF BLOCKED PERSONS, BLOCKED VESSELS, SPECIALLY DESIGNATED NATIONALS, SPECIALLY DESIGNATED TERRORISTS, SPECIALLY DESIGNATED GLOBAL TERRORISTS, FOREIGN TERRORIST ORGANIZATIONS, AND SPECIALLY DESIGNATED NARCOTICS TRAFFICKERS (as of May 20, 2009):

7TH OF TIR (a.k.a. 7TH OF TIR COMPLEX; a.k.a. 7TH OF TIR INDUSTRIAL COMPLEX; a.k.a. 7TH OF TIR INDUSTRIES; a.k.a. 7TH OF TIR INDUSTRIES OF ISFAHAN/ESFAHAN; a.k.a. MOJTAMAE SANATE HAFTOME TIR; a.k.a. SANAYE HAFTOME TIR; a.k.a. SEVENTH OF TIR), P.O. Box 81465-478, Isfahan, Iran; Mobarakeh Road Km 45, Isfahan, Iran [NPWMD]

2000 DOSE E.U. (a.k.a. DOMA E M), Calle 31 No. 1-34, Cali, Colombia; NIT # 805015749-3 (Colombia) [SDNT]

2000-DODGE S.L., Calle Gran Via 80, Madrid, Madrid, Spain; C.I.F. B83149955 (Spain) [SDNT]

2904977 CANADA, INC. (a.k.a. CARIBE SOL; a.k.a. HAVANTUR CANADA INC.), 818 rue Sherbrooke East, Montreal, Quebec H2L 1K3, Canada [CUBA]

A A TRADING FZCO, P.O. Box 37089, Dubai, United Arab Emirates [SDNTK]

A G REPRESENTACIONES LTDA., Calle 20N No. 5N-26 Of. 102, Cali, Colombia; Calle 22 Norte No. 9-43, Cali, Colombia; NIT # 800132578-3 (Colombia) [SDNT]

A K DIFUSION S.A. PUBLICIDAD Y MERCADEO, Calle 28N No. 6BN-54, Cali, Colombia; NIT # 900015699-8 (Colombia) [SDNT]

A K EDUCAL S.A. EDUCACION CON CALIDAD, Calle 28N No. 6BN-54, Cali, Colombia; NIT # 900015704-7 (Colombia) [SDNT]

A.T.E. INTERNATIONAL LTD. (a.k.a. RWR INTERNATIONAL COMMODITIES), 3 Mandeville Place, London, United Kingdom [IRAQ2]

A.W.A. ENGINEERING LIMITED, 3 Mandeville Place, London, United Kingdom [IRAQ2]

ABADIA BASTIDAS, Carmen Alicia (a.k.a. ABADIA DE RAMIREZ, Carmen Alicia), Calle 9 No. 39-65, Cali, Colombia; c/o DISDROGAS LTDA., Yumbo, Valle, Colombia; c/o RAMIREZ ABADIA Y CIA. S.C.S., Cali, Colombia; DOB 15 Jul 1934;

POB Palmira, Valle, Colombia; Cedula No. 29021074 (Colombia) (individual) [SDNT]

ABASTECEDORA NAVAL Y INDUSTRIAL, S.A. (a.k.a. ANAINSA), Panama [CUBA]

ABAUNZA MARTINEZ, Javier; DOB 1 Jan 1965; POB Guernica, Vizcaya Province, Spain; D.N.I. 78.865.882 (Spain); Member ETA (individual) [SDGT]

ABBAKAR MUHAMAD, Abdul Aziz; DOB 1961; POB Sudan; Passport 562605 (Sudan) issued 28 Oct 1998; IARA Peshwar, Pakistan Director (individual) [SDGT]

ABBAS, Abdul Hussein, Italy (individual) [IRAQ2]

ABBAS, Abu (a.k.a. ZAYDAN, Muhammad); DOB 10 Dec 1948; Director of PALESTINE LIBERATION FRONT—ABU ABBAS FACTION (individual) [SDT]

ABBAS, Kassim, Lerchesbergring 23A, D-60598, Frankfurt, Germany; DOB 7 Aug 1956; POB Baghdad, Iraq (individual) [IRAQ2]

ABBES, Moustafa, Via Padova, 82, Milan, Italy; DOB 5 Feb 1962; POB Osniers, Algeria (individual) [SDGT]

ABBES, Youcef (a.k.a. "GIUSEPPE"), Via Padova 82, Milan, Italy; Via Manzoni, 33, Cinisello Balsamo, Milan, Italy; DOB 5 Jan 1965; POB Bab El Aoued, Algeria (individual) [SDGT]

ABD AL HAFIZ, Abd Al Wahab (a.k.a. FERDJANI, Mouldou; a.k.a. "MOURAD"; a.k.a. "RABAH DI ROMA"), Via Lungotevere Dante, Rome, Italy; DOB 7 Sep 1967; POB Algiers, Algeria (individual) [SDGT]

ABD AL-GHAFAR, Sundus, Iraq; DOB circa 1967; POB Kirkuk, Iraq; nationality Iraq; wife of Izzat Ibrahim Al-Duri (individual) [IRAQ2]

ABD AL-KHALIQ, Adil Muhammad Mahmud (a.k.a. ABDUL KHALED, Adel

- BONYAD-E SHAHID VA ISARGARAN; a.k.a. ES-SHAHID; a.k.a. IRANIAN MARTYRS FUND; a.k.a. SHAHID FOUNDATION; a.k.a. SHAHID FOUNDATION OF THE ISLAMIC REVOLUTION), P.O. Box 15815-1394, Tehran 15900, Iran [SDGT]
- MARTYRS FOUNDATION IN LEBANON (a.k.a. AL-MUA'ASSAT AL-SHAHID; a.k.a. AL-SHAHID CHARITABLE AND SOCIAL ORGANIZATION; a.k.a. AL-SHAHID FOUNDATION; a.k.a. AL-SHAHID ORGANIZATION; a.k.a. HIZBALLAH MARTYRS FOUNDATION; a.k.a. ISLAMIC REVOLUTION MARTYRS FOUNDATION; a.k.a. LEBANESE MARTYR ASSOCIATION; a.k.a. LEBANESE MARTYR FOUNDATION; a.k.a. MARTYRS INSTITUTE), Biqa' Valley, Lebanon; P.O. Box 110 24, Bir al-Abed, Beirut, Lebanon [SDGT]
- MA'RUF, Taha Muhyi-al-Din (a.k.a. MARUF, Taha, Muhyi al-Din); DOB 1924; POB Sulaymaniyah, Iraq; nationality Iraq; Vice President; member of Revolutionary Command Council (individual) [IRAQ2]
- MARUMAHOKO, Rueben, 11 Douglas Clark Avenue, The Grange, Harare, Zimbabwe; DOB 4 Apr 1948; Deputy Minister for Home Affairs (individual) [ZIMBABWE]
- MARYOL ENTERPRISES INC., c/o EMPRESA DE NAVEGACION MAMBISA, Apartado 543, San Ignacio 104, Havana, Cuba [CUBA]
- MARZUKI, Zulkifli (a.k.a. BIN MARZUKI, Zulkifli; a.k.a. BIN ZUKEPLI, Marzuki; a.k.a. MARZUKI, Zulkiepli; a.k.a. ZUKIPLI; a.k.a. ZULKIFLI); DOB 3 Jul 1968; POB Malaysia; nationality Malaysia (individual) [SDGT]
- MASPIO CEMENT CORPORATION, P.O. Box 96, Atbara, Sudan [SUDAN]
- MASTERS INTERNATIONAL LTD., New Boundary House, London Road, Sunningdale, Ascot, Berkshire SL5 0DJ, United Kingdom; Business Registration Document # 2927685 (United Kingdom) [ZIMBABWE]
- MASTERS INTERNATIONAL, INC., 1905 S. Florida Avenue, Lakeland, FL 33803; US FEIN 133798020 (United States) [ZIMBABWE]
- MASUKU, Angeline; DOB 14 Oct 1936; Matebeleland South Provincial Governor & Politburo Secretary for Gender and Culture (individual) [ZIMBABWE]
- MATA MATA, Noel (a.k.a. MATTA MATTA, Noel; a.k.a. "EFRAIN GUZMAN"; a.k.a. "EL CHUCHO"); DOB 31 Jan 1935; alt. DOB 30 Jan 1935; POB Chaparral, Tolima, Colombia; Cedula No. 4870352 (Colombia) (individual) [SDNTK]
- MATADERO METROPOLITANO LTDA., Apartado Aereo 3786, Pereira, Colombia; Km. 3 Via Marsella Parque Industrial, Pereira, Colombia; Carrera 10 No. 34-21 Dosq., Pereira, Colombia; NIT # 891412986-8 (Colombia) [SDNT]
- MATANGA, Godwin; DOB 5 Feb 1962; Passport ZL042663 (Zimbabwe); Deputy Police Commissioner (individual) [ZIMBABWE]
- MATERIAS PRIMAS Y SUMINISTROS S.A. (a.k.a. MATERIAS PRIMAS Y SUMINISTROS LTDA.; a.k.a. MATSUM S.A.), Calle 12B No. 28-58, Bogota, Colombia; Calle 39 Bis A No. 27-16, Bogota, Colombia; Calle 39 Bis A No. 27-20, Bogota, Colombia; NIT # 830031863-3 (Colombia) [SDNT]
- MATHEMA, Cain; DOB 28 Jan 1948; Bulawayo Provincial Governor (individual) [ZIMBABWE]
- MATHUTHU, Sithokozile; Matabeleland North Provincial Governor & Deputy Secretary for Transport and Social Welfare (individual) [ZIMBABWE]
- MATIBIRI, Innocent Tonderai; DOB 9 Oct 1968; Deputy Police Commissioner (individual) [ZIMBABWE]
- MATIZA, Biggie Joel; DOB 17 Aug 1960; Passport ZA557399 (Zimbabwe); Deputy Minister of Rural Housing and Social Amenities (individual) [ZIMBABWE]
- MATONGA, Bright; DOB circa 1969; Deputy Minister of Information and Publicity (individual) [ZIMBABWE]
- MATRIX CHURCHILL CORPORATION, 5903 Harper Road, Cleveland, OH 44139 [IRAQ2]
- MATSHALAGA, Obert; DOB 21 Apr 1951; Deputy Minister of Foreign Affairs (individual) [ZIMBABWE]
- MATTHEW, Karen, c/o Freight Movers International, Basseterre, Saint Kitts and Nevis; DOB 27 Jan 1964; POB St Vincent & Grenadines (individual) [SDNTK]
- MATTHEWS, Glenroy Vingrove (a.k.a. MATHEW, Glenroy; a.k.a. MATTHEW, Glenroy Wingrove; a.k.a. MATTHEWS, Glen Roy), Frigate Bay, Saint Kitts and Nevis; DOB 26 Jul 1958; POB St Kitts and Nevis; Passport 047815 (Saint Kitts and Nevis) (individual) [SDNTK]
- MAX (MYANMAR) CONSTRUCTION CO., LTD, 1 Ywama Curve, Bayint Naung Road, Ward (2), Hlaing Township, Yangon, Burma [BURMA] [JADE]
- MAX MYANMAR GEMS AND JEWELLERY CO., LTD., 1 Ywama Curve, Bayint Naung Road, Ward (2), Hlaing Township, Yangon, Burma [BURMA] [JADE]
- MAX MYANMAR GROUP OF COMPANIES (a.k.a. MAX MYANMAR; a.k.a. MAX MYANMAR CO.; a.k.a. MAX MYANMAR COMPANY LIMITED; a.k.a. MAX MYANMAR GROUP), No. 1 Ywama Curve, Ba Yint Naung Road, Ward (2), Hlaing Township, Yangon, Burma [BURMA] [JADE]
- MAX MYANMAR MANUFACTURING CO., LTD., 1 Ywama Curve, Bayint Naung Road, Ward (2), Hlaing Township, Yangon, Burma [BURMA] [JADE]
- MAX MYANMAR SERVICES CO., LTD., 1 Ywama Curve, Bayint Naung Road, Ward (2), Hlaing Township, Yangon, Burma [BURMA] [JADE]
- MAX MYANMAR TRADING CO., LTD., 1 Ywama Curve, Bayint Naung Road, Ward (2), Hlaing Township, Yangon, Burma [BURMA] [JADE]
- MAX SINGAPORE INTERNATIONAL PTE. LTD., 3 Shenton Way, #24-02, Shenton House 068805, Singapore [BURMA] [JADE]
- MAXITIENDAS TODO EN UNO, Avenida Guadalupe con Avenida Simon Bolivar, Cali, Colombia [SDNT]
- MAY ENGINEERING COMPANY, C/O ENGINEERING EQUIPMENT CORPORATION, P.O. Box 97, Khartoum, Sudan [SUDAN]
- MAYOR COMERCIALIZADORA LTDA., Carrera 40 No. 169-30 Barrio Toberin, Bogota, Colombia; NIT # 800088288-4 (Colombia) [SDNT]
- MAZANDARAN CEMENT COMPANY, 40 Satari Ave., Afrigha Highway, P.O. Box 19688, Tehran, Iran; Africa Street, Sattari Street No. 40, P.O. Box 121, Tehran 19688, Iran [NPWMD]
- MAZANDARAN TEXTILE COMPANY (a.k.a. SHERKATE NASAJI MAZANDARAN), Kendovan Alley 5, Vila Street, Enghelab Ave., P.O. Box 11365-9513, Tehran 11318, Iran; Sari Ave., Ghaemshahr, Iran; 28 Candovan Cooy Enghelab Ave., P.O. Box 11318, Tehran, Iran [NPWMD]
- MAZUERO ERAZO, Hugo, c/o INVERSIONES SANTA LTDA., Cali, Colombia; c/o GRUPO SANTA LTDA., Cali, Colombia; c/o SOCIEDAD CONSTRUCTORA LA CASCADA S.A., Cali, Colombia; DOB 17 Jul 1936; alt. DOB 1945; alt. DOB 14 Jul 1936; Cedula No. 2445590 (Colombia) (individual) [SDNT]
- MBARUSHIMANA, Callixte, Paris, France; Thiais, France; DOB 24 Jul 1963; POB Ndusu/Ruhengeri, Northern Province, Rwanda; alt. POB Ruhengeri Province, Rwanda; citizen Rwanda; FDLR Executive Secretary (individual) [DRCONGO]
- MC OVERSEAS TRADING COMPANY SA DE CV, Justo Sierra 1963, Guadalajara, Jalisco, Mexico [SDNT]
- MEADOWBROOK INVESTMENTS LIMITED, 44 Upper Belgrave Road, Clifton, Bristol BS8 2XN, United Kingdom; Registered Charity No. 05059698 (United Kingdom) [SDGT]
- MEDIA MARKETING E.U., Avenida 4N No. 6-67 of. 610, Cali, Colombia; NIT # 805019234-0 (Colombia) [SDNT]
- MEDINA CASTILLO, Sandro, c/o LITOPHARMA, Barranquilla, Colombia; c/o SU SERVICIO SOCIEDAD LTDA., Bogota, Colombia; Cedula No. 8538055 (Colombia) (individual) [SDNT]
- MEDINA FAJARDO, Yovany (a.k.a. MEDINA FAJARDO, Yovani), c/o CODISA, Bogota, Colombia; c/o FARMACOP, Bogota, Colombia; DOB 21 Nov 1969; Cedula No. 11317493 (Colombia); Passport 11317493 (Colombia) (individual) [SDNT]
- MEDINA, Ana Maria (a.k.a. MEDINA, Anita), Panama (individual) [CUBA]
- MEED INTERNATIONAL LIMITED, 3 Mandeville Place, London, United Kingdom [IRAQ2]
- MEFLA MOSQUERA, Aristides, c/o FARMALIDER S.A., Cali, Colombia; Cedula No. 6039981 (Colombia) (individual) [SDNT]
- MEGA DOLAR, S.A. DE C.V. (a.k.a. MEGA DOLAR MULTISERVICIOS), Local C-25 Plaza Rio, Colonia Zona Rio, Tijuana, Baja California, Mexico; Av. Via Rapida 25-E, Colonia Zona Rio, Tijuana, Baja California, Mexico; R.F.C. MDO-940316-RTA (Mexico) [SDNTK]
- MEGAPHARMA LTDA. (a.k.a. COMERCOOP; a.k.a. COOPERATIVA HUILENSE DE COMERCIALIZACION COMERCOOP LTDA.; a.k.a. COOPERATIVA MULTIACTIVA DE DISTRIBUCION MEGAPHARMA LTDA.), Calle 15 No. 31-99 Bodega 5 Parque Industrial Acerosa, Yumbo, Colombia; Carrera 26 No. 62-42,



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

KATHLEEN JENNINGS, Attorney)
General of the State of Delaware,)
)
Plaintiff,)
)
v.)
)
MASTERS INTERNATIONAL INC., a)
Delaware corporation,)
)
Defendant.)

C.A. No. _____

VERIFICATION OF JOSEPH RAGO

STATE OF DELAWARE)
)
COUNTY OF NEW CASTLE)

SS:

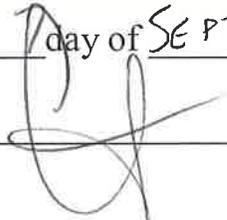
Joseph Rago, being duly sworn, does depose and say:

1. I have read the foregoing VERIFIED COMPLAINT and it is true and correct.



Joseph Rago, Department of Justice

SWORN AND SUBSCRIBED before me this 1 day of SEPTEMBER, 2019



Notary Public

SUPPLEMENTAL INFORMATION PURSUANT TO RULE 3(A)
OF THE RULES OF THE COURT OF CHANCERY

EFiled: Sep 19 2019 11:50AM EDT
Transaction ID 64222374
Case No. 2019-0756-



The information contained herein is for the use by the Court for statistical and administrative purposes only. Nothing stated herein shall be deemed an admission by or binding upon any party.

1. Caption of Case:

Kathleen Jennings, Attorney General of the State of Delaware, Plaintiff, v. Masters International Inc., a Delaware corporation, Defendant

2. Date Filed: September 19, 2019

3. Name and address of counsel for plaintiff(s):

Lawrence Lewis, Deputy Attorney General (#2539), Delaware Department of Justice, Carvel State Office Building, 820 N. French Street Wilmington, DE 19801

4. Short statement and nature of claim asserted:

Verified Complaint to Cancel Certificate of Formation

5. Substantive field of law involved (check one):

<input type="checkbox"/> Administrative law	<input type="checkbox"/> Labor law	<input type="checkbox"/> Trusts, Wills and Estates
<input type="checkbox"/> Commercial law	<input type="checkbox"/> Real Property	<input type="checkbox"/> Consent trust petitions
<input type="checkbox"/> Constitutional law	<input type="checkbox"/> 348 Deed Restriction	<input type="checkbox"/> Partition
<input type="checkbox"/> Corporation law	<input type="checkbox"/> Zoning	<input type="checkbox"/> Rapid Arbitration (Rules 96,97)
<input type="checkbox"/> Trade secrets/trade mark/or other intellectual property		<input checked="" type="checkbox"/> Other

6. Related cases, including any Register of Wills matters (this requires copies of all documents in this matter to be filed with the Register of Wills):

None

7. Basis of court's jurisdiction (including the citation of any statute(s) conferring jurisdiction):

8 Del. C. §284(a).

8. If the complaint seeks preliminary equitable relief, state the specific preliminary relief sought.

Not Applicable

9. If the complaint seeks a TRO, summary proceedings, a Preliminary Injunction, or Expedited Proceedings, check here . (If #9 is checked, a Motion to Expedite must accompany the transaction.)

10. If the complaint is one that in the opinion of counsel should not be assigned to a Master in the first instance, check here and attach a statement of good cause.

/s/ Lawrence Lewis (#2539)
Signature of Attorney of Record
& Bar ID